

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANDREA GLADSTONE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:23-cv-00491-TL

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
ANSWER DEADLINE AND
DEADLINES TO SUBMIT
PROPOSED PROTECTIVE ORDER
AND ESI PROTOCOL

NOTE ON MOTION CALENDAR:
JULY 10, 2024

Pursuant to Judge Lin's Standing Order for All Civil Cases and Local Civil Rules 7(d)(1) and 10(g), Defendant Amazon Web Services, Inc. ("AWS") and Plaintiff Andrea Gladstone ("Plaintiff," and together with AWS, "the Parties") jointly move to extend the deadlines to submit a proposed Protective Order and ESI Protocol from July 16, 2024, to August 13, 2024.

In addition, AWS respectfully moves for a brief extension of the deadline for AWS to file its answer to the Second Amended Class Action Complaint ("SAC") (Dkt. 18) from July 16, 2024, to August 13, 2024. AWS has consulted with Plaintiff's counsel and Plaintiff does not object to this requested relief.

In support of the foregoing request for relief, the Parties state as follows:

1. The Court denied AWS's Motion to Dismiss the SAC on July 2, 2024. (Dkt. 44.)

1 2. The Parties previously jointly proposed submitting a proposed Protective Order
2 and a proposed Agreement re: Discovery of Electronically Stored Information (“ESI Protocol”)
3 within 14 days of the Court’s ruling on AWS’s Motion to Dismiss, which would make those
4 proposals likewise due on July 16, 2024. (Dkt. 25.)

5 3. Pursuant to Federal Rule of Civil Procedure 12(a)(4), AWS’s deadline to file its
6 answer to the SAC is July 16, 2024.

7 4. On July 10, 2024, the Parties met and conferred to discuss pretrial deadlines.
8 Consistent with the Court’s Order re: Parties’ Joint Status Report (Dkt. 29) and Order on Motion
9 to Dismiss (Dkt. 44), the Parties anticipate submitting a Second Joint Status Report proposing
10 pretrial deadlines on July 16, 2024.

11 5. Given the complexity of this case, the Court’s recent order denying AWS’s
12 Motion to Dismiss, and the intervening Independence Day holiday, AWS requires additional
13 time to prepare its answer to the SAC. The Parties also have conferred and agree that they
14 require additional time to meet and confer regarding a proposed Protective Order and ESI
15 Protocol. Good cause exists for these extensions based on the complexity of the matter, the
16 current procedural posture, and pre-planned absences of the Parties and their counsel.

17 6. In light of the foregoing, AWS respectfully requests that the Court extend to
18 August 13, 2024, AWS’s deadline to file its answer to Plaintiff’s SAC. Plaintiff does not oppose
19 the request.

20 7. Further, the Parties jointly request that the Court modify the Parties’ proposed
21 deadline for submission of a proposed Protective Order and ESI Protocol to August 13, 2024.

22 WHEREFORE, the Parties respectfully request that the Court enter an order extending
23 existing case deadlines in accordance with this Stipulated Motion.

1 DATED: July 10, 2024

2
3 Respectfully Submitted:

4 By: s/ Erin K. Earl
Erin K. Earl, Bar No. 49341
5 Ryan Spear, Bar No. 39974
Nicola C. Menaldo, Bar No. 44459
6 Jordan Harris, Bar No. 55499
PERKINS COIE LLP
7 1201 Third Avenue, Suite 4900
Seattle, Washington 98101
8 Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000
9 RyanSpear@perkinscoie.com
NMenaldo@perkinscoie.com

10 *Counsel for Defendant*
11 *Amazon Web Services, Inc.*

By: s/ Max S. Roberts
Wright A. Noel
CARSON NOEL PLLC
20 Sixth Avenue NE
Issaquah, WA 98027
Telephone: +1.425.837.4717
Wright@carsonnoel.com

Joseph I. Marchese
Max S. Roberts
BURSOR & FISHER, P.A.
1330 Avenue of the Americas, 32nd Fl.
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
JMarchese@bursor.com
MRoberts@bursor.com

Neal J. Deckant (*pro hac vice* forthcoming)
BURSOR & FISHER, P.A.
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
NDeckant@bursor.com

17 *Counsel for Plaintiff*
18 *Andrea Gladstone*

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated this 11th day of July, 2024.



Tana Lin
United States District Judge

Presented by:

By: s/ Erin K. Earl

Erin K. Earl, Bar No. 49341
Ryan Spear, Bar No. 39974
Nicola C. Menaldo, Bar No. 44459
Jordan Harris, Bar No. 55499
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000
RyanSpear@perkinscoie.com
NMenaldo@perkinscoie.com

*Counsel for Defendant
Amazon Web Services, Inc.*

By: s/ Max S. Roberts

Wright A. Noel
CARSON NOEL PLLC
20 Sixth Avenue NE
Issaquah, WA 98027
Telephone: +1.425.837.4717
Wright@carsonnoel.com

Joseph I. Marchese
Max S. Roberts
BURSOR & FISHER, P.A.
1330 Avenue of the Americas, 32nd Fl.
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
JMarchese@bursor.com
MRoberts@bursor.com

Neal J. Deckant (*pro hac vice*
forthcoming)
BURSOR & FISHER, P.A.
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
NDeckant@bursor.com

*Counsel for Plaintiff
Andrea Gladstone*